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Director - State Regulatory Affairs

NOV 5 1997

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REGULATORY

November 5, 1997

Mr. James P. Lamoureux
AT&T
Room 4060
1200 Peachtree Street, N. E.
Atlanta, GA 30309

RE: Docket No. 97-00888 (Universal Service)
Response to Discovery Request

Dear Mr. Lamoureux:

Enclosed is the response of United Telephone-Southeast, Inc. to the Discovery Request of AT&T Communications of the South Central States, Inc. Please contact me if you have questions regarding this response.

Sincerely yours,

C. Steve Parrott

Enclosures

c: Laura Sykora (with enclosures)
Jim Wright (with enclosures)
Bob Wallace (with enclosures)
Tony Key (with enclosures)
Austin Lyons (with enclosures)
Counsel of Record (with enclosures)

**UNIVERSAL SERVICE
DOCKET NO. 97-00888
DISCOVERY REQUEST OF AT&T COMMUNICATIONS OF THE
SOUTH CENTRAL STATES, INC. TO
UNITED TELEPHONE-SOUTHEAST, INC.**

DATA REQUEST NO. 1

Please provide UTSE's residential total revenue, separately, for each of the following categories for 1996 or the last recorded twelve months (whichever is later): basic local service, federal subscriber line charge, state subscriber line charge, vertical/optional services, EAS and other optional calling plans. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

Response: United objects to providing this information based on the Tennessee Regulatory Authority's decision in this case to delay determination of costs until Phase II. In the absence of cost data, there is no way to determine the extent or amount of universal support needed and thus the requested revenue data is irrelevant. Requests for revenue data made in later phases of this proceeding will be provided if not found objectionable on other grounds.

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DATA REQUEST NO. 2

Please provide UTSE's single line business total revenue, separately, for each of the following categories for 1996 or the last recorded twelve months (whichever is later): basic local service, federal subscriber line charge, state subscriber line charge, vertical/optional service, EAS and other optional calling plans. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

Response: See Response to Data Request No. 1

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DATA REQUEST NO. 3

Please provide UTSE's multi-line business total revenue, separately, for each of the following categories for 1996 or the last recorded twelve months (whichever is later): basic local service, federal subscriber line charge, state subscriber line charge, vertical/optional services, EAS and other optional calling plans. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

Response: See Response to Data Request No. 1.

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DATA REQUEST NO. 4

For the same period as the data provided above, please provide UTSE's residential revenue, separately, obtained from interstate access, intrastate interLATA access and intrastate intraLATA access. Additionally, provide the originating and terminating access minutes associated with each access revenue category. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

Response: See Response to Data Request No. 1.

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DATA REQUEST NO. 5

For the same period as the data provided above, please provide UTSE's single line business revenue, separately, obtained from interstate access, intrastate interLATA access and intrastate intraLATA access. Additionally, provide the originating and terminating access minutes associated with each access revenue category. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

Response: See Response to Data Request No. 1

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DATA REQUEST NO. 6

For the same period as the data provided in Data Request No. 3, please provide UTSE's multi-line business revenue, separately, obtained from interstate access, intrastate interLATA access and intrastate intraLATA access. Additionally, provide the originating and terminating access minutes associated with each access revenue category. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

Response: See Response to Data Request No. 1.

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DATA REQUEST NO. 7

For the same period, please provide UTSE's residential revenue, separately, obtained from interstate, intrastate interLATA toll and intrastate intraLATA toll. Additionally, provide the conversation minutes associated with each toll revenue category. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

Response: See Response to Data Request No. 1.

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DATA REQUEST NO. 8

For the same period, please provide UTSE's single line business revenue, separately, obtained from interstate, intrastate interLATA toll and intrastate intraLATA toll. Additionally, provide the conversation minutes associated with each toll revenue category. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

Response: See Response to Data Request No. 1.

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DATA REQUEST NO. 9

For the same period, please provide UTSE's multi-line business revenue, separately, obtained from interstate, intrastate interLATA toll and intrastate intraLATA toll. Additionally, provide the conversation minutes associated with each toll revenue category. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

Response: See Response to Data Request No. 1.

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DATA REQUEST NO. 10

Please provide, for the midpoint of the period the data above, the total amount of in-service subscriber lines, separately, for residential service, single line business service and multi-line business service. Additionally, provide the quantity of residential in-service subscriber lines that are installed in addition to the first single line at a residence. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

Response: The requested information is not relevant to issues in Phase I of this proceeding.

CERTIFICATE
Universal Service Fund
(Docket No. 97-00888)

The undersigned hereby certifies that a copy of the Response of United Telephone-Southeast, Inc. to AT&T's Interogatorries dated October 30, 1997 served in the above docket is being provided to each of the following, by placing a copy of the same in the United States Mail postage prepaid and addressed as follows:

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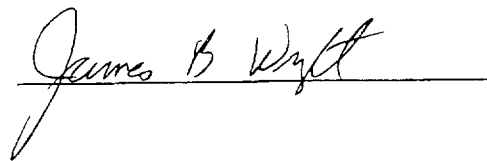
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This 5th day of November, 1997



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